

DAVID L. ANDERSON (CABN 149604)  
 United States Attorney  
 SARA WINSLOW (DCBN 457643)  
 Chief, Civil Division  
 PAMELA T. JOHANN (CABN 145558))  
 Assistant United States Attorney

450 Golden Gate Avenue, Box 36045  
 San Francisco, California 94102  
 Telephone: (415) 436-7025  
 Facsimile: (415) 436-7234  
 pamela.Johann@usdoj.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND DIVISION

THE CENTER FOR INVESTIGATIVE  
 REPORTING and JENNIFER GOLLAN,

Plaintiffs,

v.

UNITED STATES DEPARTMENT OF  
 LABOR,

Defendant.

) Case No. 18-cv-02414-DMR

) **SECOND STIPULATED JOINT REQUEST TO**  
 ) **EXTEND BRIEFING SCHEDULE REGARDING**  
 ) **MOTION FOR SUMMARY JUDGMENT;**  
 ) **ORDER**

The parties, by and through their undersigned attorneys, hereby stipulate pursuant to Civil Local Rule 6-1(b) and 7-12, subject to the approval of the Court, to extend the schedule regarding the parties' Motions for Summary Judgment. This stipulation is based on the accompanying Declaration of Pamela T. Johann and the following facts:

1. On July 2, 2019, this Court entered an order granting the parties' stipulated request to establish a briefing schedule for cross-motions for summary judgment. Dkt. No. 21. On August 20, 2019, the Court entered an order granting the parties' stipulation extending the briefing schedule on the motions. Dkt. No. 23. Under this schedule, the last day for Defendant to file its Motion for Summary Judgment is September 3, 2019.

2. Defendant is in the process of preparing its moving papers but has encountered some

delays due in part to the illness of one of the anticipated declarants. Due to these circumstances and the intervening holiday weekend, Defendant has requested, and Plaintiff has agreed, to extend by one week the time for Defendant to file its Motion for Summary Judgment. The hearing date shall remain December 12, 2019. The parties do not currently anticipate needing to modify the other filing dates, but if any further adjustment is needed, they will submit another stipulated request.

3. Accordingly, the parties have stipulated to extend the last day for Defendant to file a motion for summary judgment until September 10, 2019. The parties jointly request that the Court enter an order revising the schedule accordingly.

DATED: August 30, 2019

Respectfully submitted,

DAVID L. ANDERSON  
United States Attorney

/s/ Pamela T. Johann  
PAMELA T. JOHANN  
Assistant United States Attorney

Attorneys for Defendant

DATED: August 30, 2019

THE CENTER FOR INVESTIGATIVE  
REPORTING

/s/ D. Victoria Baranetsky  
D. VICTORIA BARANETSKY

Attorneys for Plaintiffs

#### ATTESTATION

I, Pamela T. Johann, hereby attest that I have obtained the concurrence in the filing of this document from D. Victoria Baranetsky.

/s/ Pamela T. Johann  
PAMELA T. JOHANN

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: September 3, 2019

HON. DONNA M. RYU  
United States Magistrate Judge

